

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

A.S.R., individually and on behalf of all others
similarly situated,

Petitioner–Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No. 3:25-cv-00113-SLH

NOTICE OF CISNEROS DECLARATION

Petitioner-Plaintiff (“Petitioner”) respectfully write to alert the Court that the government revealed new, directly relevant information yesterday, April 23, 2025, in a declaration submitted at 2:13pm CDT to the Southern District of Texas, which the government submitted directly to the court under seal. *See J.A.V. v. Trump*, No. 1:25-cv-072 (S.D. Tex. filed Apr. 23, 2025), ECF No. 45, Exhibit D. That declaration, along with an exhibit that was omitted yesterday, was docketed today around 10:16am CDT at ECF No. 49. The declaration concerns the amount of notice that the government is providing to individuals who are designated for removal under the Alien Enemies Act (“AEA”).

At a hearing in the afternoon of April 24, 2025, the Southern District of Texas granted a motion to unseal the Cisneros Declaration, *see* ECF No. 49, so Petitioner is now providing this Court a copy of that declaration and its accompanying exhibit. The government has previously suggested that notice of designation 24 hours ahead of scheduled removal was sufficient. The declaration states that individuals are given **12 hours**’ notice, Cisneros Decl. ¶ 11, and that if they express an intent to file a habeas petition, they are given 24 hours to actually file that petition, *id.*

Dated: April 24, 2025

Respectfully submitted,

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**Pro hac vice applications forthcoming*
***Admitted pro hac vice*